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16 *dba California Auto Finance and*
17 *Carlos Navas*

18 **UNITED STATES DISTRICT COURT**
19 **DISTRICT OF NEVADA**

20 GUEORGUI GANTCHEV and GEORGE'S
21 AND GEORGE'S, LLC dba LV CARS, a
22 Nevada limited liability company,

23 Plaintiff,

24 vs.

25 3RD GENERATION INC. dba
26 CALIFORNIA AUTO FINANCE, CARLOS
NAVAS, DOES I-X and ROE
CORPORATIONS I-X,

27 Defendants.

28 Case No. 2:17-cv-00185-RFB-DJA
29 Case No. 2:17-cv-01692-JAD-PAL

30 [CONSOLIDATED CASES]

31 **STIPULATION AND ORDER TO**
EXTEND TIME TO FILE JOINT
PRETRIAL ORDER

32 **(SECOND REQUEST)**

33 3RD GENERATION INC. dba
34 CALIFORNIA AUTO FINANCE, a
35 California corporation,

36 Counterclaimant,

37 vs.

38 GEORGE'S AND GEORGE'S, LLC d/b/a
39 LV Cars, a Nevada limited liability company;
40 GUEORGUI GANTCHEV, individually, and
41 as Manager for GEORGE'S AND
42 GEORGE'S, LLC d/b/a LV Cars, a Nevada
43 limited liability company; DOES I-X; and
44 ROE CORPORATIONS I-X,

45 Counterdefendants.

1 Plaintiffs/Counterdefendants Gueorgui Gantchev (“Gantchev”) and George’s and
2 George’s, LLC d/b/a LV Cars (“LV Cars”) (together, “Plaintiffs”), by and through their
3 attorneys of record, Eva Garcia-Mendoza, Esq., of the Law Offices of Eva Garcia-Mendoza;
4 and Defendant-Counterclaimant 3rd Generation, Inc. d/b/a California Auto Finance (“CAF”)
5 and Defendant Carlos Navas (“Navas”) (together, the “CAF Parties”), by and through their
6 attorneys of record, the law firm of Marquis Aurbach Coffing, hereby stipulate and request,
7 that the deadline to file a Joint Pretrial Order be extended forty-five (45) days from the
8 current deadline of November 1, 2019, to December 16, 2019. ECF No. 68.

9 WHEREAS, counsel have been in communication among themselves and with their
10 respective clients regarding utility of possible mediation, and, although they previously
11 determined that mediation is not practical at this time, the discussions delayed preparation of
12 the Joint Pretrial Order;

13 WHEREAS, the parties stipulated [ECF No. 67] and the Court entered an Order
14 [ECF No. 68] extending the deadline for submission of the Pretrial Order from October 25,
15 2019, to and including November 1, 2019; and

16 WHEREAS, the parties are currently revisiting the notion of settlement and are
17 engaged in earnest settlement discussions in hopes of resolving this matter without need for
18 further litigation and the associated costs of the same;

19 THEREFORE, the parties respectfully submit that good cause exists and jointly
20 request that this Court extend the deadline to file the Joint Pretrial Order by forty-five (45)
21 days from the current deadline of November 1, 2019, to December 16, 2019.

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1 APPROVED AS TO FORM AND CONTENT.

2 Dated this 30th day of October, 2019. Dated this 30th day of October, 2019.

3 **LAW OFFICES OF EVA GARCIA- MARQUIS AURBACH COFFING
MENDOZA**

4 By: /s/ Eva Garcia-Mendoza By: /s/ Jared M. Moser

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George's and George's, LLC d/b/a LV Cars*

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14 **ORDER**

15 IT IS SO ORDERED this 13th day of October, 2019.

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18 **UNITED STATES DISTRICT JUDGE**